

Herst & Associates, Inc.

RECEIVED

OCT 01 1998

SUPERFUND CIVIL

Mr. Steven Kinser
U. S. Environmental Protection Agency
Region VII
WSTM/SPFD/REML
726 Minnesota Avenue
Kansas City, Kansas 66101

0714
Site: West Lake 012
ID #MBD07990932
Break: 10.9
Other: 9-29-98
JWH

September 29, 1998

Dear Mr. Kinser:

**Disposal Activities Near the West Lake (Bridgeton) Landfill
Bridgeton, Missouri**

Attached are a memorandum and photographs describing disposal of sludge-like material immediately south of the West Lake (Bridgeton) Landfill, Missouri, adjacent to the leachate retention pond on property not controlled by Allied Waste Industries, Inc. (Allied). The disposal activities were observed by Herst & Associates, Inc. personnel in September 1998. As described in the memorandum, the material apparently represents sediments excavated from the Earth City flood control channel.

Because the disposal activities occurred adjacent to West Lake Landfill Operable Unit 2, Allied requested that you receive a copy of the information.

If you have any questions, please contact Mr. Doug Borro or the undersigned.

Sincerely,

Herst & Associates, Inc.



Ward E. Herst, CPHG, CEM
Director

cc: Jalal El-Jayyousi - Missouri Department of Natural Resources
Michael Hockley, Esq. - Spencer Fane Britt & Browne
Doug Borro - Allied Waste Industries, Inc.
Rod Bloese - Allied Waste Industries, Inc.
Matt Kingsley - Allied Waste Industries, Inc.

40241209

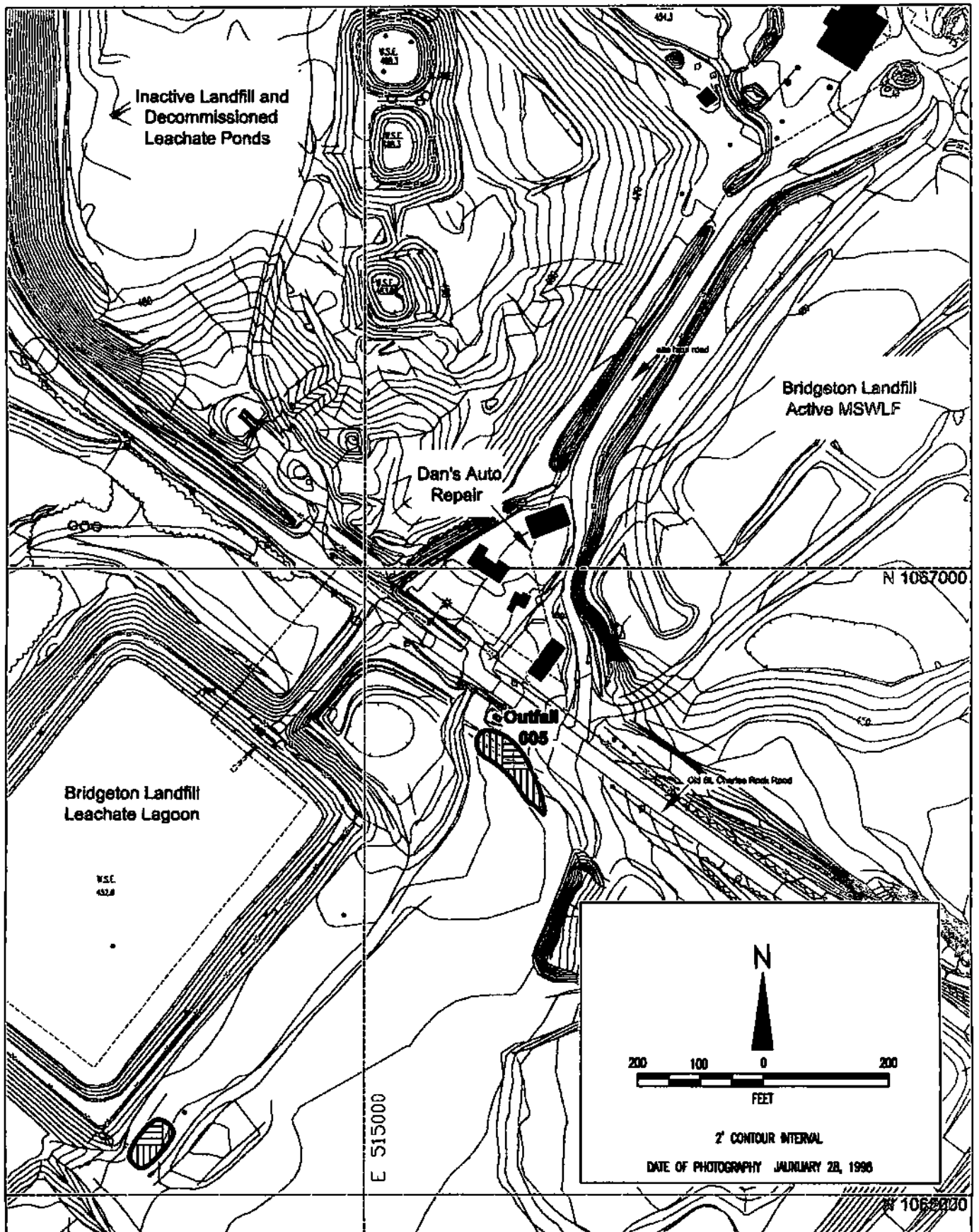


SUPERFUND RECORDS

MEMORANDUM

To: Ward Herst
Copy to: Doug Borro, Matt Kingsley
From: John D Regan
Date: September 16, 1998
Subject: Dumping of flood control channel sludge near the Bridgeton Landfill

On August 28, 1998, Herst & Associates, Inc. personnel noticed a large quantity of a gray sludge-like material being dumped from dump trucks near the Bridgeton Landfill leachate Outfall 005, south of the active landfill, across Old St. Charles Rock Road. The material was being dumped by Thoele Asphalt Paving and Seal Coating out of St. Louis Missouri (314) 724-1623. The material was a wet gray sludge with the consistency of fresh concrete. The material was flowing slowly downhill toward the Outfall 005 manhole. The approximate dumping area and Outfall 005 are shown on Figure 1. Mr. Richard Ferris of Bridgeton Landfill was contacted regarding this activity. Mr. Ferris was unaware of the dumping activities in the area. Herst & Associates personnel accompanied Mr. Ferris to the dumping site. Mr. Ferris stated that the dumping was being done without his knowledge and he spoke to the truck drivers. The dump truck drivers referred Mr. Ferris to Dave Kolb Grading, Inc. (314) 441-0200. Mr. Ferris spoke with the foreman on site for Dave Kolb and showed him that the sludge threatened to cover two manholes just to the south of the Outfall 005 manhole. The Dave Kolb foreman checked to make sure that the manholes were not covered, and assured Mr. Ferris that the manholes would not be covered. By the time that dumping activities were halted, approximately 10 dump truck loads of sludge material had been dumped in the vicinity of Outfall 005, and the sludge had flowed to within about 20 feet of the manhole. Herst & Associates personnel took photographs of the material, copies of which are attached. Herst & Associates personnel viewed the area again on September 1, 1998. The material had not been removed. In addition, new dumping activities were occurring immediately southeast of the Leachate Lagoon. The Dave Kolb personnel were excavating an area approximately 30 yards square by 1 yard deep, and then dumping the sludge into this area. Mr. Ferris reported that the Dave Kolb personnel stated that the material was being dredged from the flood control channel in the area of a new development to the south of the Leachate Lagoon, and were being placed in these locations to be dried.



**Figure 1. Materials Dumped by Others
Near Bridgeton Landfill, LLC**



Sludge

Outfall 005
(behind tree)

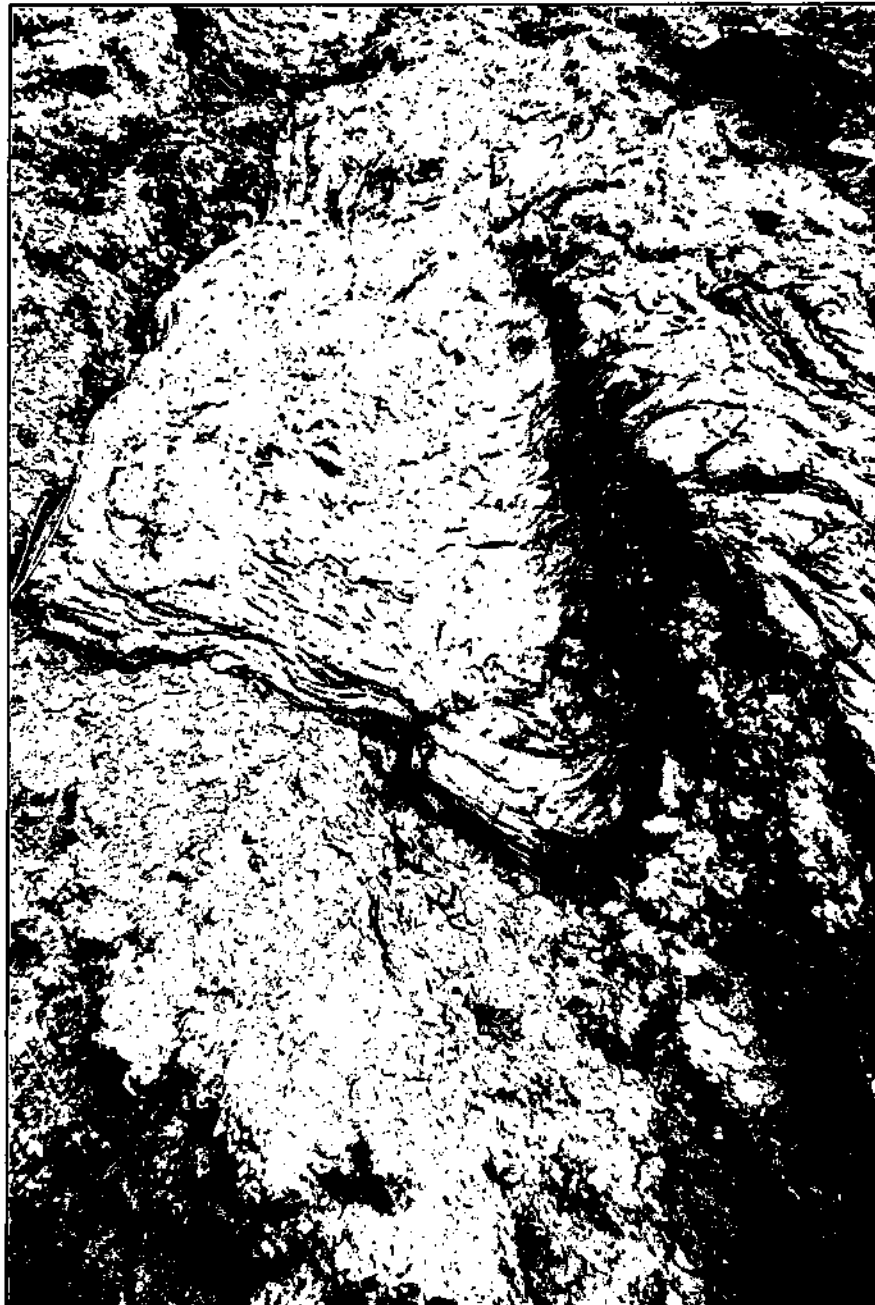
Herst & Associates, Inc.

Panoramic view from borrow area haul road
toward the southwest; site leachate lagoon beyond
first line of bushes; Earth City beyond tree line.



Herst & Associates, Inc.

Two views of sludge
materials dumped near
Outfall 005.



Herst & Associates, Inc.

Close-up view of sludge materials.



MSD Lift Station

Sludge

Outfall 005

Herst & Associates, Inc.

Proximity of sludge material
to Outfall 005.